

AO 91 (Rev. 11/11) Criminal Complaint

FILED**UNITED STATES DISTRICT COURT**

for the

Western District of Texas

September 13, 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: Pablo Chapablanco
DEPUTY

United States of America)

v.)

Romannie Shrouder)

Case No. **EP:24-M-03929-ATB**Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 5, 2024 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section*Title 18, United States Code,
Section 922(n)*Offense Description*Receive a firearm which has been shipped or transported in interstate or
foreign commerce while under indictment for a crime punishable by
imprisonment for a term exceeding one yearA true copy of the original, I certify,
Clerk, U.S. District CourtBy PC
Bertie

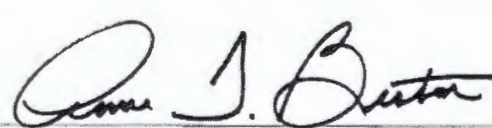
This criminal complaint is based on these facts:

See Attached Affidavit Which is Hereby Incorporated by Reference

☒ Continued on the attached sheet.
Complainant's signature

Joshua Dolan, Special Agent - ATF

Printed name and title

Date: 09/13/2024 03:29 PMCity and state: El Paso, Texas
Judge's signature

Anne T. Berton, U.S. Magistrate Judge

Printed name and title

Warrant sworn to telephonically on
September 13, 2024 at 03:29 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**

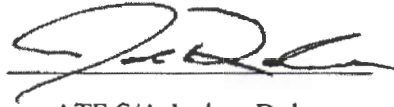
AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Your affiant, Joshua Dolan, first being duly sworn, does hereby depose and state as follows:

1. That your affiant is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been so employed since July of 2022. Your affiant has received specialized training regarding the investigation and enforcement of Federal Firearms violations and have conducted investigations regarding individuals involved in illegal firearms activities.
2. This affidavit is based upon your affiant's present knowledge obtained during your affiant's investigation as well as information provided to me by other law enforcement officers. The facts in this affidavit come from your affiant's personal observations, training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause and does not set forth all my knowledge about this matter.
3. Your affiant recently initiated an investigation into the activities of Romannie SHROUDER. This investigation relates to violations of Title 18, United States Code, Section 922(n).
4. On or about April 26, 2024, a Federal Firearms Licensee (FFL) located in El Paso, TX, in the Western District of Texas, notified ATF about a suspicious firearm purchase attempt by an individual with initials D.M.
5. ATF received information from a separate FFL located in El Paso, TX, in the Western District of Texas, that on or about April 29, 2024, D.M. purchased one, FN, Model SCAR17S, 308-caliber rifle with serial number H1C27926.
6. On or about June 5, 2024, your affiant and Special Agent (SA) Zayas conducted a custodial interview of D.M. at Fort Bliss Military Base. D.M. stated he understood his rights and verbally waived his right to have an attorney present during questioning.
7. During the interview, D.M. advised SA's that the FN, Model SCAR17S, 308-caliber rifle with serial number H1C27926 purchased by D.M. was being stored at Romannie SHROUDER's residence located at 5781 Port Lavaca Dr. El Paso, TX 79924.
8. Your affiant reviewed criminal history and court records for SHROUDER. Criminal history for SHROUDER lists an arrest of SHROUDER by El Paso Police Department (EPPD) on November 27, 2022, for aggravated assault with a deadly weapon.
9. El Paso County Court records relating to the arrest show on or about February 16, 2023, SHROUDER was indicted for the aforementioned offense in the 171st District Court, El

Paso County, Texas. On or about August 24, 2023, SHROUDER was sentenced to deferred adjudication with 10 years probation and 300 hours of community service.

10. Your affiant contacted El Paso County Community Supervision Officer Samantha Cheek about the probation status of SHROUDER. Officer Cheek advised your affiant that SHROUDER is currently on probation after being arrested for aggravated assault with a deadly weapon and is prohibited from possessing firearms.
11. El Paso Central Appraisal District lists "SCHROUDER ROMANNIE" as the owner of 5781 Port Lavaca Dr. El Paso, TX 79924.
12. On or about June 5, 2024, your affiant, SA Zayas, Resident Agent in Charge (RAC) Kushner, and Customs and Border Protection (CBP) ATF Task Force Officer (TFO) Morales conducted an interview of Romannie SHROUDER at 5781 Port Lavaca Dr. El Paso, TX 79924.
13. Agents identified themselves and provided their government issued credentials to SHROUDER. SHROUDER advised that D.M. was storing a firearm inside of SHROUDER's residence and gave agents consent to enter SHROUDER's residence to view the firearm.
14. SHROUDER led agents directly to one FN, Model SCAR17S, 308-caliber rifle with serial number H1C27926, the same firearm that was purchased by D.M. The firearm was being stored inside of SHROUDER's residence on the floor in what appeared to be a storage room.
15. SHROUDER advised that D.M. has kept the firearm at SHROUDER's residence for approximately one to two weeks. SHROUDER advised that he knew he was currently on deferred probation. The FN, Model SCAR17S, 308-caliber rifle with serial number H1C27926 was seized by ATF for suspected violations of 18 USC 922(d)(1).
16. On or about August 13, 2024, an ATF interstate nexus expert reviewed the descriptors of the FN, Model SCAR17S, 308-caliber rifle with serial number H1C27926, that was purchased by D.M. The ATF interstate nexus expert determined the firearm was not manufactured in the state of Texas, therefore affecting interstate commerce.
17. Based on the aforementioned facts and circumstances, your affiant believes probable cause exists that Romannie SHROUDER knowingly received a firearm which has been shipped or transported in interstate or foreign commerce while under indictment for a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 922(n).

A handwritten signature in black ink, appearing to read "Joshua Dolan", written over a horizontal line.

ATF S/A Joshua Dolan